

Notes from Meeting with Veolia on Pre-draft of Title V Renewal

September 30, 2014

9:30am

Attendees:

EPA: Genevieve Damico, Andrea Morgan, David Ogulei, and Jane Woolums

Veolia: Jeff Everett, Doug Harris, Joe Kellmeyer, Ryan Kemper, David Klarich, Greg Siedor and Dennis Warchol

Veolia's Comments on the Fact Sheet

- Add an 's' to 'baghouse'
- Veolia provided a list of their suggested revisions to the fact sheet, and stated that the majority were self-explanatory and there was no need to walk through them at the meeting.
- One concern highlighted was the phrase, "emit large amounts of pollution" in terms of Title V applicability. Veolia does not believe it emits large amounts of pollution and is subject to Title V because it is subject to a MACT.

Comments on the Statement of Basis (SOB)

- Veolia is concerned by language that implies that incinerators 2 and 3 are similar. They note that they are distinct units and burn different types of materials. Additionally, there is a vertical duct on unit 2 that results in a different cyclonic flow.
- Veolia also stated that there were some minor errors present in the SOB (ie. misrepresentation of the size of a tank, and NEIC acronym was incorrectly defined)
- Veolia will make comments during the public comment period
- Veolia has concerns as to the fact that the inadequate FAP was used as justification for the CEMS and then both revisions to the FAP and CEMS were required in the permit. They find this link to be unclear and believe that the inadequate FAP should only be used to justify and enhanced FAP or the CEMS, not both.

Comments on Title V Permit

The requirement for a CEMS

- Veolia notes that to their knowledge no facility in the US or world is currently operating a multi-metals CEMS.
- Veolia notes that they have received affidavits from operators who had used a multi-metal CEMS and states they do not work.
- Veolia expressed concerns that the requirement to operate a CEMS would render the facility non-viable against its competitors.
- Veolia suggests that the issues EPA identified with the FAP are not unique to Veolia and the justification EPA uses to require a multi-metal CEMS applies to all hazardous waste

incinerators. Therefore, all HWC should be required to operate a multi-metal CEMS through a MACT revision.

- Doug Harris states that he would be unable to sign a compliance certification for the facility if multi-metal CEMS were required because he does not believe the instrument works.
- Veolia expressed concerns about lack of a competitive market for CEMS and its ethical concerns regarding the fact that they believe it is essentially a sole-source contract.
- Veolia expressed safety concerns when deviations occur
 - Waste may begin to react if it is not burned to completion
 - Veolia burns some controlled substances that they are not allowed to store, they would violate those rules if they were to have to stop incinerating due to a deviation.
 - If a deviation occurred while something in the blending tank was being burned, Veolia states that the tank farm would essentially be shut down since it would no longer be able to feed to another incinerator and would prevent other tanks from being emptied.
 - Veolia believes most tanks contain at least some amount of heavy metals.
 - The standard is 12 hours, Veolia disagrees with a deviation being determined after 15 minutes of data and expressed averaging time concern.
- Veolia believes that deviation could be defined more clearly in the permit.
- Additionally Veolia is concerned that 3 CEMS are proposed in the renewal rather than the 1 CEMS proposed in the reopening.
- Veolia indicates that on average, they have scheduled shutdowns once every 6-9 months and the shutdowns last for 7-9 days. However, the other two incinerators are operational whenever the one is shutdown.

The FAP

- Veolia requested to have the technical staff meet separately to discuss the FAP
 - They believe they have an improved feedstream analysis
 - Will schedule a meeting with Veolia to discuss
- Veolia currently has 2 ICP's (and has a third on order) and 4 Indirect Mercury Analyzers.
- Veolia stated that the NEIC report was informative and they have made changes as a result
- They no longer allow generators to use a standard profile for waste that contains heavy metals.

The NO_x, SO₂, Opacity, and VOM testing during CPT

- Veolia has no objection to doing initial baseline testing
- Veolia would prefer this be a one-time test at a separate time from the CPT test, suggested during confirmatory testing for difuran
- Veolia would be willing to replicate the parameter of the CPT testing for the other testing
- Doug Harris stated that he does not believe that the NO_x, SO₂, Opacity, and VOM testing would threaten the viability of Veolia.

Hospital Medical Infectious Waste

- Veolia does not burn hospital medical infectious waste and does not anticipate burning it since it is not cost effective. However, they do have an IL permit that would allow them to burn it, they just currently choose not to.
- They would like the prohibition to burn hospital medical infectious waste removed from their permit in case they change their mind and would like to burn it in the future.
- EPA explained that prohibition was added to the permit so they would have a non-applicability determination and shield. The provision could be removed but Veolia would then lose its shield. Additionally, Veolia could always apply for a revision to burn it should they decide to burn it in the future.
- Veolia stated that they would need to discuss the matter further internally.